

October 5, 2020

Robin A. Pennington
U.S. Census Bureau
Decennial Census Management Division
4600 Silver Hill Road
Washington, DC 20233

RE: 2020 Census Count Question Resolution Operation, docket # USBC-2020-0005

Dear Dr. Pennington—

The Department of Commerce, Bureau of the Census, has issued a request for comments on its proposal for the 2020 Census Count Question Resolution Operation (85 FR 47162, published August 4, 2020; docket # USBC-2020-0005)

I am writing on behalf of Metropolitan Council of the Twin Cities. Our regional planning agency serves the seven-county region surrounding Minneapolis and St. Paul, providing demographic analysis and other technical assistance to all local governments in the region, and producing the official population estimates for Minnesota government uses (per Minnesota Statutes 473.24).

The counties, cities and townships in our region expect complete and accurate counts for planning uses, as well as for allocations of state and regional budget resources. In 2021-2022, we will be supporting our local governments as they analyze 2020 Census data, and as count questions or discrepancies arise.

The Census Bureau presents CQR as an intergovernmental process to identify and remediate count errors. I agree with this objective. This letter recommends a few operational adjustments to CQR that would promote greater engagement and participation of governments.

The Federal Register Notice states that “Coverage corrections are limited to census processing errors, *i.e.*, erroneous exclusions of housing identified as existing in census records.” In my experience, this framing is likely to discourage participation in CQR. Tribal, state and local governments are not well-positioned to know what errors occurred inside Census's processes. With the information they have, they can only incompletely infer errors.

I recommend the Census Bureau provide CQR guidance with advice and examples of specific data resources recommended for the calculation of preferred alternative counts to compare with Census's counts. The FRN describes that participating governments, to raise a coverage issue, will analyze “lists of residential addresses” and tabulate their alternative counts. This is presented in general terms. Tribal and local governments will need more guidance than this to effectively participate.

I understand why the Bureau refrains from being more specific; the data resources available can vary greatly across the states. To address this, I recommend that the Bureau enlist state partners as intermediaries,

providing state-specific supplemental guidance on the data resources that are most available for identifying count discrepancies. These state partners could be existing partners such as Census State Data Centers or FSCPE agencies.

The Census's Bureau proposed CQR Operation already allows state governors to appoint state agencies to identify count issues. Their participation should be particularly encouraged by the Census Bureau. Their participation, with statewide scopes of review, will promote a more complete review of 2020 Census count quality and ensure equitable treatment of all locations within each state.

I would recommend additionally that the Census Bureau equip state-level participants with unpublished data resources from 2020 operations databases. The Bureau has already published local level counts of addresses that were in MAF at the start of Census enumeration (approximately March 2020). However, what is not known, outside of Census Bureau, are why housing counts changed over the course of 2020: what number of units were removed or deleted (or added after March 2020), and at what step in the 2020 Census process that happened. If the Bureau can share such data with state-level participants, that will allow greater efficiency in identifying local discrepancies between numbers Census counted vs. numbers expected. (If this operational data is considered to be restricted, state-level participants could commit to protecting the confidentiality of such data, similar to the design of the Census's Count Review Operation.)

Our agency and the local governments in the Twin Cities region greatly value the CQR operation as a final step toward the best possible decennial census counts.

Thank you for your attention to these comments. I can be reached by email: todd.graham@metc.state.mn.us, or by US mail: Todd Graham, Metropolitan Council, Research Office, 390 North Robert Street, St. Paul, MN 55101.

Sincerely,

A handwritten signature in black ink, appearing to read "Todd Graham", written in a cursive style.

Todd Graham
Principal Demographer